

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP, in his personal capacity,

*Defendant.*

No. 20 Civ. 7311 (LAK) (JLC)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF  
PLAINTIFF E. JEAN CARROLL'S REPLY IN SUPPORT OF HER OMNIBUS  
MOTION IN LIMINE

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's reply in support of her omnibus motion in limine.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the official transcript of Robert J. Fisher's deposition, which was taken in this action on December 14 and 20, 2022.

4. Attached hereto as **Exhibit 2** is a true and correct copy of an excerpt from the official transcript of Robert J. Fisher's deposition, which was taken in the related action, *Carroll v. Trump*, No. 22 Civ. 10016 (S.D.N.Y), on February 6, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 9, 2023



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Roberta A. Kaplan